

EXHIBIT L

1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF MICHIGAN
3 SOUTHERN DISTRICT

4 JAQUELINE SMITH,

5 Plaintiff,

6 vs.

No. 2:20-cv-13470-PJD-MAR

7
8 CO/OP OPTICAL SERVICES, INC.,
9 a Michigan corporation,

10 Defendant.
11
12 _____/

13
14 The deposition of JANNA GARRISON, taken
15 before Suzanne M. McGovern, CSR 2655, Notary
16 Public for Oakland County, at 38505 Woodward
17 Avenue, Suite 2000, Bloomfield Hills, Michigan, on
18 Tuesday, January 25, 2011, at approximately 12:10
19 p.m.

20 APPEARANCES:

21 JESSE L. YOUNG, ESQ.

SOMMERS SCHWARTZ, P.C.

22 2000 Town Center, Suite 900
23 Southfield, Michigan 48075

24 Appearing on behalf of the Plaintiff
25

Page 46

1 terminated. Can I go back?
 2 Q. Yeah. You're fine. Go ahead.
 3 A. You asked me about had I ever -- did Ted ever lie
 4 to the board. Let me go back.
 5 Q. Okay.
 6 A. When that question had come up regarding did you
 7 ever share that document with Jackee, prior to
 8 that those in attendance had voted to terminate
 9 Jackee and they had drafted a letter and both Ray
 10 and Marc had signed it. I refused. I said this
 11 is nothing but a bunch of allegations and you're
 12 about to walk her out this door and we are union
 13 people and if these are the things we have fought
 14 our entire lives for -- and they signed it. After
 15 Ted said that and we probably excused him, we were
 16 in there together, they tore that letter up and
 17 then we went on to investigate, but they were
 18 about to take action, minus my signature, because
 19 I refused to sign it because I would not sign it.
 20 So that you should know.
 21 Q. Okay. Anything else you want to add?
 22 A. No, that's it.
 23 Q. Okay. I have no more questions.
 24 EXAMINATION
 25 BY MS. CAULEY:

Page 47

1 Q. Ms. Garrison, when was that meeting, the best you
 2 can do, the one you just described where the board
 3 voted to terminate her and then they tore up the
 4 letter?
 5 A. And I don't know if it was the board or the
 6 officers or the committee. It was the day that --
 7 the day that I asked Ted the question did you
 8 share the document with Jackee.
 9 Q. Okay.
 10 A. It was that meeting, so that had to have been --
 11 Q. Would it have been in December?
 12 A. It had to have been in December.
 13 Q. Okay.
 14 A. It was right way.
 15 Q. Okay.
 16 A. It may even have been December 8th.
 17 Q. That's okay. All right.
 18 A. Right.
 19 Q. A couple more questions. Did you ever learn of
 20 any facts that would support a conclusion that
 21 Miss Smith was terminated because she took FMLA
 22 leave?
 23 A. No. I do not believe Jackee was terminated
 24 because she was on FMLA.
 25 Q. Did you ever become aware of any facts to support

Page 48

1 a conclusion that Miss Smith was terminated
 2 because she was a woman?
 3 A. No. I do not think Jackee was terminated because
 4 she was a woman.
 5 Q. Okay. Thank you. That's all.
 6 MR. YOUNG: I don't have any more
 7 questions.
 8 THE WITNESS: Okay.
 9 MS. CAULEY: You're done.
 10 MR. YOUNG: Thank you.
 11 (Whereupon the deposition concluded
 12 at approximately 1:26 p.m.)
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Page 49

1 CERTIFICATION
 2 STATE OF MICHIGAN)
 3) SS
 4 COUNTY OF OAKLAND)
 5
 6 I, Suzanne M. McGovern, a Notary
 7 Public in and for Oakland County, State of
 8 Michigan, do hereby certify that the foregoing
 9 deposition was taken before me at the time and
 10 place hereinbefore set forth; that prior to the
 11 taking of said deposition the said deponent was
 12 duly placed under oath and that said deposition was
 13 duly recorded by me stenographically and later
 14 reduced to typewritten form.
 15 I further certify that I am not a
 16 relative, employee, attorney or counsel of any of
 17 the parties or attorneys.
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Suzanne M. McGovern, CSR 2655
 Notary Public, Oakland County, MI
 My Commission Expires: 2-4-14